



UNITED STATES DEPARTMENT OF EDUCATION
OFFICE OF ELEMENTARY AND SECONDARY EDUCATION

April 17, 2012

The Honorable Jason Glass
Director of Education
Iowa Department of Education
400 East 14th Street
Des Moines, Iowa 50319

Dear Director Glass:

Thank you for submitting Iowa's request for ESEA flexibility. We appreciate the hard work required to transition to college- and career-ready standards and assessments; develop a system of differentiated recognition, accountability, and support; and evaluate and support teacher and leader effectiveness. The U.S. Department of Education (Department) is encouraged that Iowa and many other States are designing plans to increase the quality of instruction and improve student academic achievement.

As you know, Iowa's request was reviewed by a panel of six peer reviewers during the week of March 26–30, 2012. During the review, the expert peers considered each component of Iowa's request and provided comments in the form of Peer Panel Notes that the Secretary will use to inform any revisions to your request that may be needed to meet the principles of ESEA flexibility. The Peer Panel Notes, a copy of which is enclosed with this letter, also provide feedback on the strengths of Iowa's request and areas that would benefit from further development. Department staff also have carefully reviewed Iowa's request, taking into account the Peer Panel Notes, to determine consistency with the ESEA flexibility principles.

The peers noted, and we agree, that Iowa's request was particularly strong in describing a coordinated monitoring and support system for priority and focus schools that has potential to advance student achievement and in providing a plan for a teacher and leader evaluation and support system based on multiple measures.

At the same time, based on the peer reviewers' comments and our review of the materials Iowa has provided to date, we have identified certain components of your request that need further clarification, additional development, or revision. In particular, significant concerns were identified with respect to the following:

www.ed.gov

400 MARYLAND AVE., SW, WASHINGTON, DC 20202

The Department of Education's mission is to promote student achievement and preparation for global competitiveness by fostering educational excellence and ensuring equal access.

- A lack of clarity regarding the relation among components of the accountability model and how results will be used to identify schools and guide appropriate interventions;
- The low expectations of the proposed long-range performance targets and the limited subgroup accountability captured in the formula for the Closing Gap Score; and
- Iowa's acknowledged need for additional capacity to address needs of student groups including English Learners and students with disabilities.

The enclosed list provides details regarding these concerns as well as other key issues raised in the review of Iowa's request that we believe must be addressed before the Secretary can approve your request for ESEA flexibility. We encourage Iowa to consider all of the peers' comments and technical assistance suggestions in making revisions to its request, but we encourage you to focus primarily on addressing the concerns identified on the enclosed list.

Although the Peer Panel Notes for Iowa provide information specific to your request, Iowa also may benefit from comments and technical assistance suggestions made by other peer panels regarding issues common to multiple State educational agencies' (SEA) requests. For this reason, Department staff will reach out to Iowa to provide relevant technical assistance suggestions and other considerations that may be useful as you revise and refine your request.

We remain committed to working with Iowa to meet the principles of ESEA flexibility and improve outcomes for all students. We stand ready to work with Iowa as quickly as possible. In order to ensure prompt consideration of revisions or additional materials, we are asking SEAs to submit those materials by May 1, 2012. Department staff will be in touch to set up a call as early as this week to discuss the timeline and process for providing revisions or materials.

You and your team deserve great credit for your efforts thus far, and we are confident that we will be able to work together to address outstanding concerns. If you have any additional questions or want to request technical assistance, please do not hesitate to contact Sue Rigney, at 202-260-0931.

Sincerely,

A handwritten signature in black ink, appearing to read 'm yudin', with a long horizontal line extending to the right.

Michael Yudin
Acting Assistant Secretary

Enclosure

SUMMARY OF ADDITIONAL INFORMATION REGARDING IOWA'S ESEA FLEXIBILITY REQUEST

CONSULTATION

- Please provide more specific information regarding the steps Iowa took to modify its request based on stakeholder input, particularly from organizations representing English Learners. *See Consultation Question 2.*

PRINCIPLE 1: COLLEGE- AND CAREER-READY EXPECTATIONS FOR ALL STUDENTS

- Please describe how Iowa will provide support and training to school principals in transitioning to college- and career-ready standards. *See 1.B.*
- Please provide additional information on the steps that Iowa will take to ensure that English Learners and students with disabilities have access to college- and career-ready standards and aligned instructional materials, including greater clarity on how Response to Intervention (RtI) and Instructional Decision-Making (IDM) will be used to improve student achievement. *See 1.B.*

PRINCIPLE 2: STATE-DEVELOPED DIFFERENTIATED RECOGNITION, ACCOUNTABILITY, AND SUPPORT

- Please provide additional information and greater clarity regarding the school accountability system, including:
 - The business rules for assigning index points to schools for the Performance Index and for differentiating schools within the Performance Categories. *See 2.A.i.*
 - An explanation of how students without growth data are assigned on the Achievement Score grid. *See 2.A.i.*
 - Concerns regarding the standard of expectation created by the target of 85 points. *See 2.A.i.*
 - The calculation of the Closing Gap Score and how the score is used in the accountability system. *See 2.A.i.*
 - Increasing the weight given to graduation rates in the accountability system. *See 2.A.i. and 2.A.i.b.*
 - Aligning the language of the text with the tables and the supplemental material provided in order to provide greater clarity regarding the accountability system. *See 2.B.*
- Please address concerns regarding the calculation and reporting of annual measurable objectives (AMO's) (performance targets set separately in at least reading/language arts and mathematics for the State, local educational agencies (LEAs), and schools and subgroups), including addressing concerns that the AMOs are not as rigorous as required. *See 2.B.*
- Please demonstrate that Iowa's list of reward, priority and focus schools meets the definitions in ESEA flexibility. Refer to the document titled *Demonstrating that an SEA's List of Reward, Priority, and Focus Schools Meet ESEA Flexibility Definitions*. *See 2.C.i., 2.D.i. and 2.E.i.*
- Please provide additional information and clarity regarding the interventions for priority schools, their alignment with the turnaround principles, and that all turnaround principles are implemented simultaneously in each priority school. *See 2.D.iii.a and 2.D.iii.b.*
- Please clarify the timeline for priority school implementation. *See 2.D.iv.*

- Please strengthen Iowa's exit criteria for priority schools so that it is clear that a school that exits priority school status has made significant progress in improving student achievement. *See 2.D.v.*
- Please address concerns regarding the effectiveness of the interventions for focus schools, and how these interventions will meet the needs of specific subgroups, including English Learners and students with disabilities. *See 2.E.iii.*
- Please address concerns regarding the rigor of the exit criteria for focus schools by:
 - Demonstrating that a school may not exit focus status without making significant progress in improving student achievement and narrowing achievement gaps for the subgroup(s) of students for which the school was identified. *See 2.E.iv.*
 - Describing how the use of the Closing Gap Score will assure that the subgroups used for school identification have made sufficient progress. *See 2.E.iv and 2.E.iv.a.*
- Please describe the steps Iowa will take to ensure meaningful consequences for priority and focus schools that do not make progress after full implementation of interventions. *See 2.D.iii.b and 2.E.iv.*
- Please describe how Iowa's accountability system will provide incentives and supports for other Title I schools that are based on Iowa's new AMOs and other measures. *See 2.F.i. and 2.F.ii.*
- Please describe the process for building SEA, LEA, and school capacity including how Iowa will:
 - Help build SEA, LEA, and school capacity to address the needs of English Learners, students with disabilities, and low-achieving students. *See 2.G.*
 - Hold LEAs, not just schools, accountable for successfully implementing interventions in priority schools, focus schools, and other Title I schools. *See 2.G, 2.G.i. and 2.G.iii.*
- Please address the concerns about the capacity of the SEA and LEAs to provide incentives and supports, and to monitor the large number of schools that will be identified within Iowa's accountability system, considering that Iowa indicates that it will be identifying both Title I and non-Title I schools in its accountability system and will do so annually. *See 2.G.*

PRINCIPLE 3: SUPPORTING EFFECTIVE INSTRUCTION AND LEADERSHIP

- Please describe how Iowa will develop and adopt guidelines by the end of the 2011-2012 school year, including strategies that Iowa will adopt if relevant legislation is not enacted. *See 3.A.i.*
- Please address the concerns regarding Iowa's plan for developing its teacher and principal evaluation and support system, including:
 - Addressing the concerns regarding the three-year evaluation cycle for career teachers. *See 3.B.*
 - Providing guidance to LEAs on appropriate measures of student growth for specific situations, such as teachers in non-tested grades and subjects, teachers of English Learners and students with disabilities who partner with general education teachers, and teaching specialists. *See 3.B.*
 - Providing adequate guidance and technical assistance to support LEAs that will develop their own teacher and principal evaluation and support systems rather than adopting the State model. *See 3.B.*
 - Providing additional information on how Iowa will support professional development for teachers tied to teacher performance on specific standards. *See 3.B.*

- Please explain how Iowa plans to work with teachers and administrators or, as appropriate, their designated representatives, in order to implement the evaluation and support plans outlined in the request. *See 3.B.*
- Please describe how Iowa will ensure that LEAs create teacher and principal evaluation and support systems that include as a significant factor data on student growth for all students, consistent with the definition for student growth in ESEA flexibility. *See 3.B.*